UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

February 6, 1998

Mr. Joseph Joyce
BRAC Environmental Coordinator
AC/S Environment (1AU)
MCAS El Toro
P.O. Box 5001
Santa Ana, CA 92709-5001

Re: EPA EVALUATION OF MCAS EL TORO RESPONSE TO EPA COMMENTS ON DRAFT FINAL PHASE II FEASIBILITY STUDY REPORT FOR OU-3A, MCAS EL TORO, CA, AND EPA EXSTENSION REQUEST

Dear Mr. Joyce:

This letter contains EPA's evaluation of MCAS El Toro's responses to our comments on the document referenced above, as well as comments on the Feasibilty Study itself. In addition, I am requesting until March 9, 1998 to submit EPA's remaining comments (relating mostly to ARARs). This request is made pursuant to Section 9.2(g) of the Federal Facilities Agreement.

RESPONSES TO COMMENTS

1. **Executive Summary, Response to Specific Comment 3.** Please expand the response to state that Table ES-2 is now Table 1-4 in Section 1, page 1-23.

2. **Attachment A, Response to Specific Comment 5.** The text did not include fuel, electricity, and water usage or community acceptability. Please refer either the text or the response as appropriate.

3. **Attachment A, Response to Specific Comment 7.** Since degradation rates are highly variable and dependent on site-specific conditions like aerobic/anaerobic conditions, temperature, microbial population, concentrations of target and other contaminants, the specific phases (soil, water, air) present, etc., please provide a detailed description of how the degradation rates listed in this response were measured or obtained. Also, explicitly cite the study(ies) used as a basis for this response. To ensure concentration changes were not due to sample heterogeneity, the results of replicate analyses should have been

included in the study cited. Generally, high concentrations of PAHs are toxic to the organisms, and studies are done on water with low concentrations; the relative concentrations in the soil at El Toro and the media/concentrations used in the study should be carefully compared and described.

4. **Attachment A, Response to Specific Comment 30.** The response references the response to Comment 15 of Attachment A. Comment 15 deals with another concern and is not appropriate to the discussion. A more appropriate reference would be to refer to Comment 21 of Attachment A. Please clarify or revise as necessary.

5. **Attachment B, Response to Specific Comment 4.** The text did not include fuel, electricity, and water usage or community acceptability. Please refer to either the text or the response as appropriate.

6. **Attachment C, Response Specific Comment 1.** Please expand the response to the comment. The information cited appears to be for general infiltration of the MCAS El Toro area and may be appropriate for this specific location. However, since the drainage ditch collects and concentrates surface runoff, it is more likely that saturated conditions will exist for longer periods of time in the drainage ditch so infiltration at this location is more likely. The reference cited (< 5 inches/year) may take local variations of infiltration into consideration, but this is not reflected in the response.

7. **Attachment C, Response to Specific Comment 8.** The response should also state that in addition to the resistance to leaching of the COPCs at the site, irrigation would only be necessary to offset excess evapotranspiration. From a groundwater volume perspective, total infiltration should be minimal.

8. **Attachment C, Response to Specific Comment 22.** The response references the response to Comment 15, Attachment C. There is no response number 15 for Attachment C.

NEW COMMENTS

1. **Leaching/Solubility Testing.** In the discussion of Alternative 3 in each Attachment (Sections A3.2.1.3, B3.3, and C3.3), it is stated that sampling of the soils would be performed to demonstrate that analyte concentrations do not exceed toxicity characteristic leaching procedure (TCLP), solubility threshold limit concentration (STLC), and total threshold limit concentration (TTLC) regulatory levels, so that the soils could be used as cover material at an on-Station landfill. It was not clear in the document or Response to Comment 6, DTSC, which references the RI for this site, if there has been specific testing to confirm the assumption that the threshold concentrations will not be exceeded. This is a critical point in the evaluation and selection of remedial action Alternative 3 for the three areas. Please confirm if this testing has been done or is planned.

2. **Landfill Disposal Options.** Section 2.4.2 (Preliminary Evaluation of Technologies and Selection of Representative Process Options) discusses why both on-Station and off-Station Class III landfills were eliminated as disposal options (which were for either regulatory or practical concerns). Please expand on these concerns, especially for on-Station disposal, because without treatment, the two landfill options presented in this FS are: 1) disposal in a Class I landfill, which has the most stringent citing and design requirements; or 2) use as part of the cover of an on-site Class III landfill, which is a much less stringent use. The appropriateness of these two landfilling options would not appear to be consistent to the general public without addition explanation.

If you have any questions, please feel free to contact me at (415) 744-2210.

Sincerely,

Glenn R. Kistner

Glenn R. Kistner
Remedial Project Manager
Federal Facilities Cleanup Branch

cc: Gregory Hurley, RAB Co-Chair
Tayseer Mahmoud, DTSC
Andy Piskin, SWDIV
Lawrence Vitale, RWQCB